Application No. 10/675,035

Attorney Docket No. 537125-66063

## REMARKS

The following remarks are made in response to the Office Action mailed January 5, 2007.

As a preliminary matter, the correspondence address for this application has been changed to:

Thompson Coburn LLP One US Bank Plaza St. Louis, MO 63101

Please address all further correspondence in this matter to the above address. Also, the Customer Number associated with this application has been changed to 21888 and Deposit Account 20-0823.

Claims 1-23 are pending in the application. Claims 1, 7, 15, 20 have been amended.

Claims 24-37 were canceled pursuant to a response to a restriction requirement mailed October

2. 2006. Claims 38-41 have been canceled herein.

Applicant respectfully requests reconsideration of the application in view of the following remarks.

## The Claims are Patentable over U.S. Pat. No. 3,686,735 and U.S. Pat. No. 4,470,436

The Office Action relies upon Hill '735 and Kubuta '436 in rejecting the claims.

Reconsideration of the rejections based upon these references is respectfully requested.

The invention recited by independent claims 1, 7, 15, and 20 is different and not at all shown or suggested by the teachings of the references of record. Claim 1 requires that the tool be adapted to be inserted in an interior of the motor stator along a center line axis of the stator such that with the first and second coil supports maintaining the first and second bundles at first and second heights, the first and second bundles are in position to be received in the first and

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second sets of stator slots. Claim 1 also requires that the tool have first and second wire supports that are configured to maintain the wire coils at the first and second heights, which are parallel to a plane encompassing the center axis of the motor stator. The other independent claims 7, 15, and 20 have similar requirements in that the transfer tool is adapted to be inserted into an interior of the motor stator along a center axis of the stator such that the first and second bundles of coils are in position to be received in the sets of stator slots. The references of record fail to show or suggest such an arrangement.

The Hill reference discloses a coil transfer tool that transfers windings from a winding form machine to a utilization device such as a stator winding placing machine. The apparatus disclosed in the Hill reference is a device that holds and transports the coils of wire without disturbing the form or shape of the wound coil from the forming machine to the placing machine where the coil can then be inserted into the stator. The Hill reference fails to show a tool which is insertable into an interior of the motor stator along a center axis of the motor stator that positions the coils in a way to be received in the first and second sets of stator slots as the tool is inserted into the interior of the motor stator. The Hill reference also fails to disclose coil supports that maintain the bundles of coils at first and second heights which are parallel to a plane encompassing the center axis of the motor stator. For these reasons, it is submitted that claims 1-23 are patentable over the Hill reference.

The Kubota '436 reference relied upon in the Office Action in rejecting the claims fails to supply any additional teaching to render the claims obvious. The Kubota '436 reference discloses a coil forming apparatus which allows for winding coils at successively increasing diameters. The coil windings of successively increasing diameters are dropped onto a coil

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receiving jig that is disposed below the winding frame. Pusher plates slide down the winding frame to push the coils onto the receiving jig. The Kubota reference fails to disclose a device which maintains the coil bundles at first and second heights parallel to a plane which encompasses the center axis of the motor stator. The Kubota reference also fails to disclose a tool which is inserted into an interior of the motor stator along the center axis of the stator such that with the coils at their selected heights, the coils are in position to be received into the stator slots. For these reasons, claims 1-23 are also patentable over Kubota '436 whether it is considered by itself or together with Hill '735.

## CONCLUSION

In view of the foregoing amendments and remarks, it is submitted that the abovereferenced application is in a condition for allowance and notification to that effect is earnestly
solicited at the Examiner's earliest convenience. The Examiner is invited to contact the
undersigned by telephone if any other matters requires resolution prior to notification of
allowance.

Respectfully submitted,

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